

# Testimony of Physicians for Social Responsibility

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Re: Proposed Rule: Strengthening Transparency in Regulatory Science  
Docket ID: EPA-HQ-OA-2018-0259  
Presented by: Alan H. Lockwood, MD, FAAN, FANA  
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Location: U.S. Environmental Protection Agency Headquarters  
William Jefferson Clinton East Building, Main Floor Room 1153  
1201 Constitution Avenue NW  
Washington, D.C. 20460

Thank you for this opportunity to speak on behalf of Physicians for Social Responsibility (PSR). I am a board-certified neurologist and an elected fellow of the American Neurological Association and the American Academy of Neurology, and Professor Emeritus of Neurology at the University at Buffalo. PSR is a 501(c)(3) scientific and educational organization headquartered in Washington DC with over 30,000 physicians, medical students, and others across the country. Our mission is to protect human life from the gravest threats to health and survival.

We submit this testimony in strong opposition to the EPA's proposed rule, "Strengthening Transparency in Regulatory Science." The proposed rule would change the standards for the inclusion of studies used by the Agency and lead to the abolition or weakening of virtually all protections under the purview of the Agency.

Under the misleading veil of "transparency," the proposed rule could force investigators to invade the confidentiality of research participants and make confidential and private data open to all. A similar concern was voiced by the current SAB writing, "there are also sensitive situations where public access may infringe on legitimate confidentiality and privacy interests ..." The rule could replace evidence-based decision-making with arbitrary determinations based on political considerations.

Peer-reviewed research has led to important gains in health:

**Air pollution.** The CAA protects us from air pollution and is arguably the most health-protective law in effect. I have written extensively about this in *The Silent Epidemic*<sup>1</sup>. Peer-reviewed studies link air pollutants with leading causes of death in the US including heart disease, stroke, and respiratory diseases. Additional studies link particulates to Alzheimer's disease and Type II Diabetes. Seminal studies include:

- The Harvard Six Cities Study that involved 8,111 adults followed for between 14 and 16 years showing a clear link between pollution and mortality<sup>2</sup>.
- The Women's Health Initiative study involving 65,893 post-menopausal women that demonstrated a link between particulates, and cardiovascular disease and stroke mortality<sup>3</sup>.
- I attended closely to the study of 1,705 neurologist-confirmed strokes showing that a transient increase in PM<sub>2.5</sub> was associated with a statistically significant increase in strokes even though levels were within limits "generally considered safe" by the EPA<sup>4</sup>.

A congressionally mandated report prepared by the EPA projected that by 2020 CAA provisions will

save two trillion dollars per year in adverse health impacts<sup>5</sup>. Many savings will positively impact the budgets of state and federal agencies at a time of ballooning deficits.

**Safe drinking water.** EPA rules provide significant protection for the developing brains of children by establishing limits on lead. Lead impairs brain development and has adverse effects on behavior and cognition. Other data link arsenic levels in drinking water to Type II diabetes and cancer.

**Natural gas production.** Natural gas production, particularly “fracking” harms health due to human proximity to wells, pumping stations, and contamination of water supplies and contributes to climate change.

**Protecting privacy.** Protecting the privacy of research participants is a keystone of biomedical research and one with which I have had years of personal experience as a member then chairman of the Buffalo VA institutional review board. Peer-reviewed journals require authors to affirm their adherence to federal privacy protections as a pre-condition for publication. This standard should not be abolished.

PSR’s mission is to “to protect human life from the gravest threats to health and survival.” To protect the scientific integrity of the EPA and protect health we oppose the deceptively named proposal, “Strengthening Transparency in Regulatory Science.”

On behalf of Physicians for Social Responsibility

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